

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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**ABEL GONZALEZ GONZALEZ and
OLMAN ELISEO VELASQUEZ FUENTES,
individually and on behalf of all others similarly
situated,**

Case No.: 20-cv-04568 (VEC)

NOTICE OF MOTION

Plaintiffs,

-against-

**TREADWELL PARK LLC (D/B/A
TREADWELL PARK), 301 SOUTH LLC
(D/B/A TREADWELL PARK), CAMGT 510
W42 RESTAURANT OPERATING LLC
(D/B/A TREADWELL PARK), 1125 FIRST
LLC (D/B/A SUGAR EAST), 245 PARK
LLC (D/B/A OAXACA MEXICAN GRILL),
ABRAHAM MERCHANT, ANDREW
(A.K.A. EMMET, and FERNANDO
RODRIGUEZ,**

Defendants.

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PLEASE TAKE NOTICE, that upon the accompanying declaration of Jamie S. Felsen, Defendants' Memorandum of Law in Support of Their Motion for Sanctions, and all the prior papers and proceedings herein, Defendants will move this Court, before the Honorable Valerie E. Caproni, at the United States Courthouse, 40 Foley Square, New York, New York 10077, on the date and at a time to be established by the Court, for (a) an order directing Plaintiffs and Plaintiffs' counsel to pay monetary sanctions and attorneys' fees pursuant to (i) Rules 11(b) & 11(c); (ii) 28 U.S.C. § 1927; and/or (iii) and the Court's inherent power, and (b) for such other and further relief as the Court deems just and proper.

Dated: Lake Success, New York
December 8, 2021

Respectfully submitted,

MILMAN LABUDA LAW GROUP, PLLC

/s/ Jamie S. Felsen, Esq.
Attorneys for Defendants
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